

III. MODULE III - CONTAINER STORAGE

III.A. DESIGNATED CONTAINER STORAGE UNITS

This Module authorizes the storage and management of contact-handled (**CH**) transuranic (**TRU**) mixed waste containers in the Waste Handling Building and Parking Area Container Storage Units described below. Specific facility and process information for the storage and management of CH TRU mixed waste in these Container Storage Units is incorporated in Permit Attachment M1 (Container Storage).

III.A.1. Waste Handling Building Container Storage Unit

The Waste Handling Building Container Storage Unit (**WHB Unit**) is located in the Waste Handling Building (**WHB**) at the WIPP facility. The WHB comprises a total enclosed area of approximately 84,000 ft² (7,804 m²). The WHB Unit shall comprise a surface area of no more than 33,175 ft² (3,082 m²) within the WHB CH Bay, as depicted in Permit Attachment M1, Figure M1-1.

The Permittees may store and manage TRU mixed waste in the WHB Unit, provided the Permittees comply with the following conditions:

- III.A.1.a. Storage containers - the Permittees shall store TRU mixed waste in containers specified in Permit Condition [III.C.1](#).
- III.A.1.b. Storage locations and quantities - the Permittees may store TRU mixed waste containers in four (4) locations in the WHB Unit, as specified in Table [III.A.1](#) below and depicted in Permit Attachment M1, Figure M1-7. The Permittees may store quantities of TRU mixed waste containers in these locations not to exceed the maximum capacities specified in Table [III.A.1](#) below.

Table III.A.1 - WHB Unit			
Description	Area	Maximum Capacity	Container Equivalent
TRUDOCK Storage Area	4,734 ft ² (440 m ²)	530.4 ft ³ (15 m ³)	Contents of 4 Content Handled Packages
NE Storage Area	2,924 ft ² (272 m ²)	1856 ft ³ (52.6 m ³)	7 loaded facility pallets
SE (Shielded) Storage Area	292.5 ft ² (27.2 m ²)	265 ft ³ (7.5 m ³)	1 loaded facility pallet
Derived Waste Storage Area	48 ft ² (4.46 m ²)	66.3 ft ³ (1.88 m ³)	1 Standard Waste Box
Total	--	2718 ft³ (77 m³)	-

III.A.1.c. Storage on facility pallets - the Permittees shall store TRU mixed waste containers unloaded from the Contact Handled Packages (**TRUPACT-II or HalfPACT** shipping containers) on facility pallets in the WHB Unit, as described in Permit Attachment M1, Section M1-1c(1).

III.A.1.d. Storage of derived waste - the Permittees shall store containers of TRU mixed derived waste only in the Derived Waste Storage Area. The Permittees shall store the derived waste containers on a pallet that provides secondary containment and elevates the containers at least 6 inches above the floor to protect them from contact with accumulated liquid.

III.A.1.e. Storage time limit - the Permittees shall not store a TRU mixed waste container in the WHB Unit for more than sixty (60) calendar days, with the exception of the Derived Waste Storage Area, where derived waste may be accumulated and stored until the container is full.

- III.A.1.f. Minimum aisle space - the Permittees shall maintain a minimum aisle space of 44 inches (1.1 m) between facility pallets in the WHB Unit.

III.A.2. Parking Area Container Storage Unit

The Parking Area Container Storage Unit (**Parking Area Unit**) is an asphalt and concrete surface extending from north of the rail sidings to the WHB, within the Controlled Area. The Parking Area Unit shall be enclosed by chain link fence. The Parking Area Unit shall comprise a surface area of no more than 115,000 ft² (10,700 m²), as depicted in Permit Attachment M1, Figure M1-2.

The Permittees may store and manage TRU mixed waste in the Parking Area Unit, provided the Permittees comply with the following conditions:

- III.A.2.a. Storage containers - the Permittees shall store TRU mixed waste in containers specified in Permit Condition [III.C.1](#). These TRU mixed waste containers shall be stored within the sealed Contact Handled Packages described in Permit Attachment M1.
- III.A.2.b. Storage locations and quantities - the Permittees shall store TRU mixed waste containers in any location within the Parking Area Unit, as specified in Table [III.A.2](#) below. The Permittees may store quantities of TRU mixed waste containers within sealed Contact Handled Packages in these locations not to exceed the maximum capacities specified in Table [III.A.2](#) below.

Table III.A.2 - Parking Area Unit			
Description	Area	Maximum Capacity	Container Equivalent
Parking Area	115,000 ft ² (10,700 m ²)	1591 ft ³ (45 m ³)	12 Contact Handled Packages containing waste
Total	--	1591 ft ³ (45 m ³)	-

- III.A.2.c. Prohibition on opening shipping containers - the Permittees shall keep the Contact Handled Packages sealed at all times while in the Parking Area Unit.
- III.A.2.d. Storage time limit - the Permittees shall not store sealed Contact Handled Packages in the Parking Area Unit for more than fifty-nine (59) days after the date the Inner Containment Vessel (**ICV**) of the Contact Handled Package was sealed at the generator site. Prior to storing a sealed Contact Handled Package, the Permittees shall verify that the ICV Closure Date for each Contact Handled Package is recorded in the WIPP Waste Information System (**WWIS**) database described in Permit Attachment B.
- III.A.2.e. Minimum aisle space - the Permittees shall maintain a minimum spacing of 4 ft (1.2 m) between Contact Handled Packages.

III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

III.B.1. Permitted Waste

The Permittees may store and manage TRU mixed waste in the WHB Unit and Parking Area Unit, provided the Permittees comply with the following conditions:

- III.B.1.a. Waste analysis plan - the TRU mixed waste shall be characterized to comply with the waste analysis plan specified in Permit Condition II.C.1.
- III.B.1.b. TSDF Waste acceptance criteria - the TRU mixed waste shall comply with the treatment, storage, and disposal facility (**TSDF**) waste acceptance criteria specified in Permit Condition II.C.3.
- III.B.1.c. Hazardous waste codes - the TRU mixed waste shall contain only hazardous waste codes specified in Permit Condition II.C.4.

III.B.2. Prohibited Waste

The Permittees shall not store or manage any TRU mixed waste that fails to comply with Permit Condition [III.B.1](#).

III.C. CONDITION OF CONTAINERS

If a container holding TRU mixed waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittees shall manage the TRU mixed waste containers specified in Permit Condition [III.C.1](#) as specified in Permit Attachment M1 and in compliance with 20.4.1.500 NMAC (incorporating 40 CFR §264.171).

III.C.1. Acceptable Storage Containers

The Permittees shall use containers that comply with the requirements for U.S. Department of Transportation shipping container regulations (49 CFR §173 - Shippers - General Requirements for Shipment and Packaging, and 49 CFR §178 - Specifications for Packaging) for storage of TRU mixed waste at WIPP. The Permittees are prohibited from storing TRU mixed waste in any container not specified in Permit Attachment M1, Section M1-1b, as set forth below:

- III.C.1.a. Standard 55-gallon (208-liter) drum - with a gross internal volume of 7.3 ft³ (0.21 m³).
- III.C.1.b. Standard waste box (SWB) - with a gross internal volume of 66.3 ft³ (1.88 m³).
- III.C.1.c. Ten-drum overpack (TDOP) - with a gross internal volume of 160 ft³ (4.5 m³). TDOPs may be used to contain up to ten standard 55-gallon drums or one SWB. TDOPs may be direct loaded or used to overpack drums or SWBs containing CH TRU mixed waste.
- III.C.1.d. 85-gallon (322-liter) drum - with a gross internal volume of up to 11.3 ft³ (0.32 m³). 85-gallon drums may be direct loaded or used for overpacking 55-gallons drums containing CH TRU mixed waste and for collecting and storing derived waste.
- III.C.1.e. 100-gallon (379-liter) drum - with a gross internal volume of 13.4 ft³ (0.38m³). 100-

gallon drums may be direct loaded with CH TRU mixed waste.

III.C.2. Derived Waste Containers

The Permittees shall use standard 55-gallon drums, SWBs, and 85-gallon drum overpacks to collect and store derived waste.

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittees shall use containers made of or lined with materials which will not react with, and are otherwise compatible with, the TRU mixed waste to be stored, so that the ability of the container to contain the waste is not impaired, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.172).

III.E. MANAGEMENT OF CONTAINERS

The Permittees shall manage all containers as specified in Permit Attachment M1 and shall keep all containers closed during storage, except when it is necessary to add waste to derived waste containers. The Permittees shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.173).

III.F. CONTAINMENT SYSTEMS

The Permittees shall maintain the secondary containment systems for all containers managed in the WHB Unit and Parking Area Unit as specified in Permit Attachment M1, Section M1-1f, and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.175).

III.G. INSPECTION SCHEDULES AND PROCEDURES

The Permittees shall inspect the WHB Unit and Parking Area Unit TRU mixed waste container storage and management areas at least weekly, in accordance with the Inspection Schedule (Permit Attachment D, Table D-1), Inspection Sheets (Permit Attachment D1), and Permit Attachment M1, Section M1-1e, to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.174).

III.G.1. Inspection of 55-Gallon Drum Seven-Packs

The Permittees shall not be required to inspect the center drum of a 55-gallon seven-pack assembly, as depicted in Permit Attachment M2, Figure M2-6.

III.G.2. Inspection of Sealed Contact Handled Packages

The Permittees shall not be required to inspect the contents of sealed Contact Handled Packages stored in compliance with Permit Condition [III.A.2](#) and Permit Attachment M1, Section M1-1e(2). The Permittees shall attach a clearly legible sign to each Contact Handled Packages indicating whether the Contact Handled Packages contains TRU mixed waste.

III.H. CLOSURE

At closure of the WHB Unit and Parking Area Unit, the Permittees shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the Closure Plan, Permit Attachment I and Permit Condition II.L, as required by 20.4.1.500 NMAC (incorporating 40 CFR §§264.111 and 264.178).

III.I. RECORDKEEPING

The Permittees shall place the results of waste analyses in the operating record as specified in Permit Condition II.K and Permit Attachment B.

PERMIT ATTACHMENTS

Permit Attachment B (as modified from WIPP RCRA Part B Permit Application, "Waste Analysis Plan" - Chapter C).

Permit Attachment D (as modified from WIPP RCRA Part B Permit Application, "Procedures to Prevent Hazards" - Chapter F).

Permit Attachment I (as modified from WIPP RCRA Part B Permit Application, "Closure Plans, Post-Closure Plans, and Financial Requirements" - Chapter I).

Permit Attachment M1 (as modified from WIPP RCRA Part B Permit Application, "Facility and Process Information" - Chapter D).

Permit Attachment M2 (as modified from WIPP RCRA Part B Permit Application, "Facility and Process Information" - Chapter D).